

On DCCEEW's faulty proposed method to model and credit Carbon Sequestration by transferring Savanna Fire Management (SFM) Emissions Avoidance (EA) projects

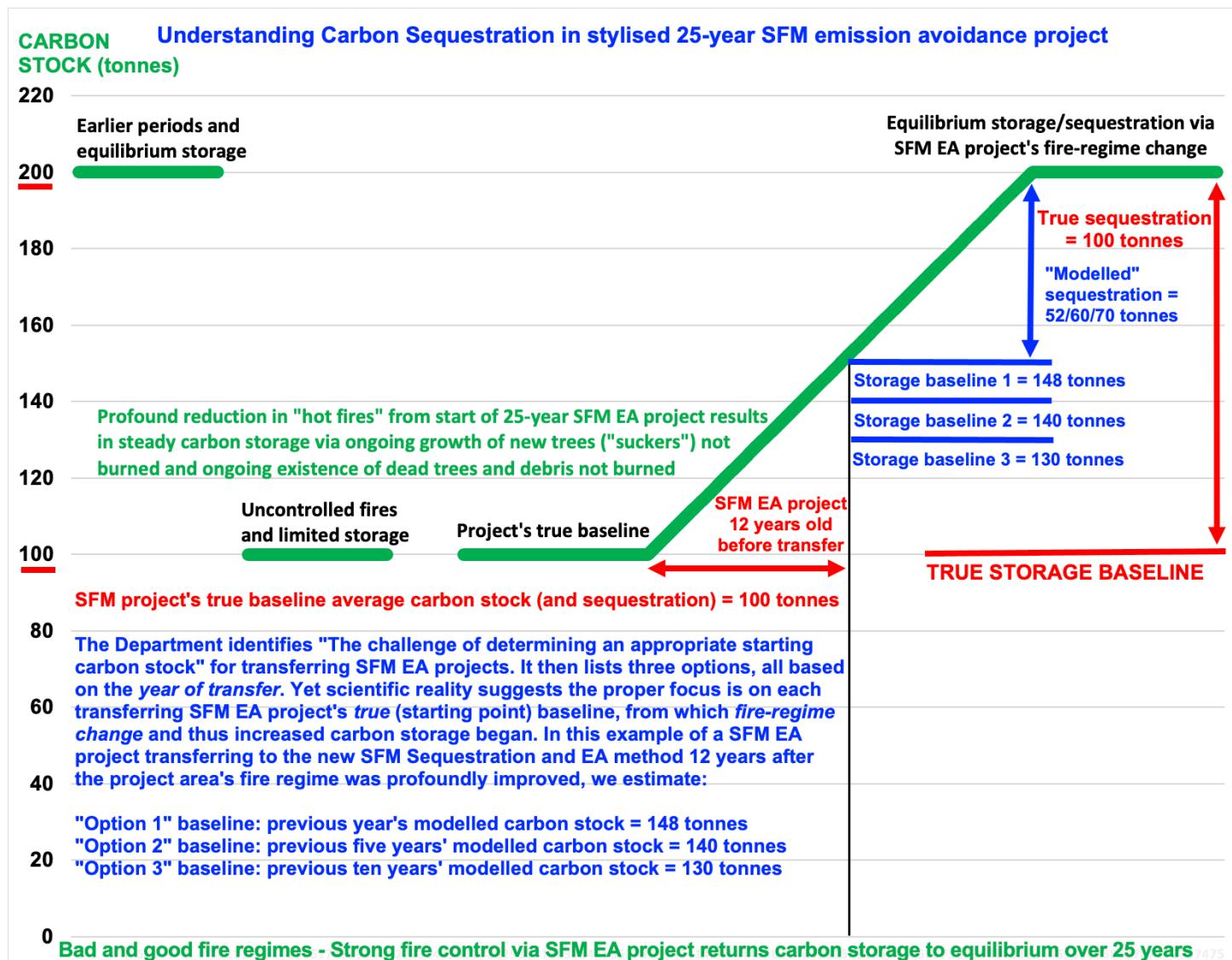
1. Recent developments and prospects

In the main hall of the 2024 North Australia Savanna Fire Forum in Darwin on 21 February, I argued that neither miners nor pastoralists are the greatest threat to the prosperity of the many Indigenous-owned SFM projects that span much of Australia's north and dominate our industry. To the **panel of CEOs** running Qld's Cape York Land Council (Dion Creek), WA's Kimberley Land Council (Tyronne Garstone) and NT's Northern Land Council (Joe Martin-Jard), I observed that the **greatest threat is the faulty and unscientific approach** by Canberra's Department of Climate Change, Energy, the Environment and Water (DCCEEW) to the long-overdue establishment of the (2023) SFM Sequestration and EA method.

Specifically, the Department's ***faulty initial (October 2023) proposal*** for the new SFM Sequestration and EA method appears to be based on a ***misreading of rules around “additionality” and “newness”*** required by the Carbon Farming Initiative (CFI) Act. The SFM industry thinks a simple misreading of the Act led the Department to propose a scientifically ***invalid approach*** to estimating/modelling the ***“appropriate starting carbon stock”*** for all transferring SFM EA projects.

My sense is that our SFM Industry Working Group has done an excellent job in assisting the Department to fix the glaring problem with its misguided initial proposal. Officials at the Darwin Summit seemed to have "heard" the key aspect of our Working Group's critique, and I assume their next proposal will be much-improved. If so, the future is bright. If not, the new SFM methodology will be "dead on arrival" - as it will be economically unviable - for many SFM industry participants.

With the Department's decision – good or bad - around estimating the "appropriate starting carbon stock" for transferring SFM EA projects expected this month, we'll soon find out if **Canberra's recently revised, now six-month timeline (p. 7, below) to an August 2024 Ministerial establishment** of the new SFM Sequestration and EA method is worth waiting for. In the meantime, my chart below helps to illustrate the critical matters that are discussed in the remainder of this note.



As an industry participant, my analysis is somewhat self-interested: I run the (50km by 50km) Strathburn Station Cape York Carbon SFM EA project <https://strathburncattlestation.com.au/pdf/strathburn-features.pdf>

As an industry participant, I've sought to educate myself and get a better understanding of the critical issues, firstly to promote my own self interest via the Strathburn project, but also so I can help others - including Strathburn's traditional owners and other Indigenous leaders – to better understand the key issues greatly influencing their future well-being.

This note draws from my two November 2023 letters to stakeholders involved in DCCEEW's public consultations. As well, my thinking has benefitted greatly from knowledge conveyed by other SFM industry participants, including Ella Rudland, Jennifer Ansell, Dr Andrew Edwards, Gary Wyatt and Julien Gastaldi. (Any remaining errors are mine alone.) My hope is that just as SFM industry leaders have been educating me, the Department – after starting badly – has been learning fast.

2. DCCEEW's faulty initial proposal on “appropriate starting carbon stock” for transferring SFM EA projects

The Department in October 2023 provided stakeholders with four documents - including the draft 2023 *Savanna Fire Management Simple Method Guide* outlining its “preliminary thoughts” (not “formal proposals or government positions”) on SFM sequestration. The Department explained: “the sequestration calculations in the proposed 2023 sequestration and emissions avoidance method are proposed to be more simple and more intuitive than the previous determination as the FullCAM model calculates yearly changes in modelled carbon stocks”. (As you know, FullCam - the Full Carbon Accounting Model - “is a calculation tool for modelling Australia’s greenhouse gas emissions from the land sector”.)

Here's the clanger that shocked/dismayed the SFM industry: “For projects transferring to the proposed SFM sequestration method from an emissions avoidance method may have been (sic) running for up to 14 years. It is **not** proposed to credit projects for sequestration that occurred while the project was under an SFM emission avoidance method.”

This initial proposal lacks credibility, simply ignoring hard scientific reality in the process of massively under-crediting SFM projects run by Indigenous groups and pastoralists. The Department is aware that SFM “emissions avoidance” (EA) projects and SFM “sequestration” projects are the same thing. And that many well-run SFM EA projects in northern Australia began making profound changes for the better to their fire regimes up to 14 years ago, so sequestration (increased carbon storage) has been proceeding apace for over a decade.

Yet the Department's plan simply disregards the profound relevance of **when** fire regimes changed. Without any explanation of the basis for its proposal – implying massive sequestration under-crediting for projects where fire regimes were profoundly improved up to 14 years ago - the Department set about **inventing an “appropriate [pretend] starting carbon stock” for transferring SFM EA projects**, nominating three potential options:

Potential option 1: “The carbon stock of the **previous year**” (now 2023);

Potential option 2: “The average carbon stock for the **5-year period** prior to transferring” (now 2019-2023); and

Potential option 3: “The average carbon stock for the **10-year period** prior to transferring” (now 2014-2023).

Correct option: “The average carbon stock over **SFM EA project’s baseline prior to fire changes**” (say 2003-2012)

The Department outlined its pros and cons for the strange options – unrelated to the *timing* of fire-regime changes – it chose: Option 1 is simple but involves a “perverse incentive to transfer only after a bad fire season; Options 2 and 3 reduce the “influence of short-term fluxes in carbon” but with “Potential to underestimate initial carbon stocks”, and so “Critics may argue that this is not conservative and may result in some backdating of accumulated sequestration.”

Alas, this is nonsense. For starters, my chart on p. 1 above illustrates the fact that SFM EA projects across northern Australia **were always** also SFM sequestration projects. Crucially, none of the Department's three baseline options above are based on underlying scientific reality. Each option unreasonably disregards the obvious thing that matters most for sequestration: **when fire regimes were profoundly improved**. Each option simply embraces the decade-plus lag between the start of many well-run SFM projects - and so the start of the sequestration process - and Canberra's 2023 proposal to **rename** SFM EA projects as SFM Sequestration and EA projects. By ignoring the fundamental relevance of **when** many SFM EA projects across northern Australia profoundly improved their fire regimes, the Department's proposal massively exaggerates SFM projects' starting-point carbon stocks (by say 30-50% - see chart) and so **massively under-credits** sequestration (the increase in carbon stocks) ultimately delivered by transferring SFM EA projects.

Notably, the Department's written guidance appeared at one point to be consistent with industry hopes for a more-scientifically valid approach: “For existing [EA] projects that transfer to the proposed 2023 SFM methods, proponents will have the option to choose between their **existing baseline** (10 or 15 years) or to move to the longer baseline [up to 20 years], using the approach described above for new projects” (p. 17, DCCEEW's draft 2023 *SFM Simple Method Guide*).

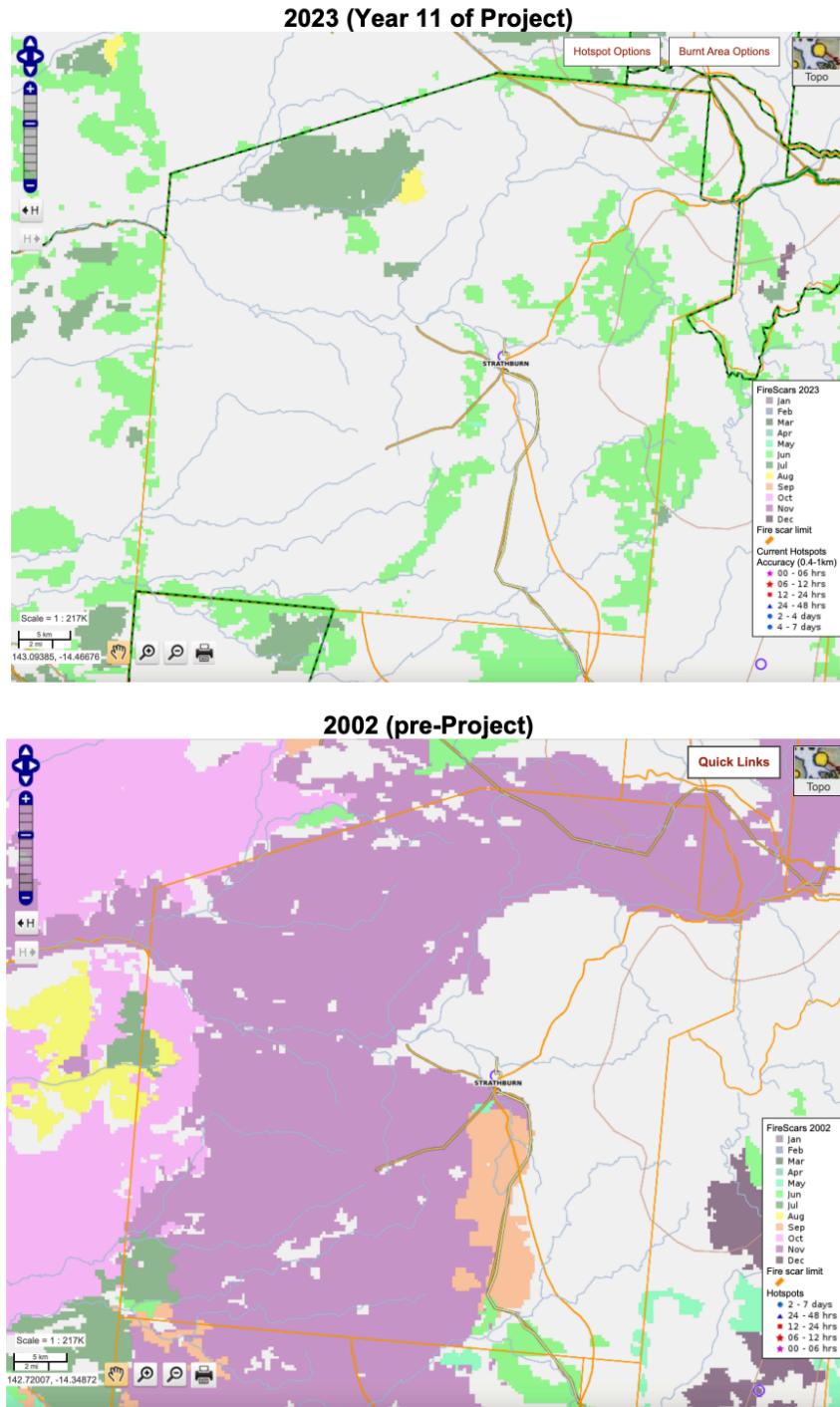
To its credit, the Department said it was particularly keen at upcoming technical workshops to discuss its initial proposals around “defining baselines and calculating sequestration for transferring projects”. For that, I produced my chart on p. 1. In the first technical workshop online, industry stakeholders explained that the Department's initial/current proposal is fundamentally flawed and utterly unacceptable. Again, the fundamental problem is that the Department is proposing to disregard Sequestration 101: “The difference in carbon stored will reflect **the change** in fire management practices”.

3. Real-world experience of profound fire-regime change and carbon sequestration on well-run SFM EA projects

To demonstrate what profound fire-regime change looks like, below are the 2002 and 2023 fire maps from my **Strathburn Station project's two-decade fire history** (see link below to see maps for all other years). As well as a huge reduction in average fire activity since 2013, "cooler" early-season burns (shaded green) quickly came to dominate "hot" late-season fires; lightning from tropical storms too-often still spark hot fires, but they now are fought day and night until they are out.

Two decades of fire history: Strathburn Station's Savanna Fire Management Project

- Fire maps below span **2002-2012** (baseline years); **2013-2023** (SFM-improved fire regime)
- Fire scars by month: **greens** early-season burns; other colours **severe late-season burns**



The many SFM projects across northern Australia that have reduced severe "hot" fires by (say) 50-90% for up to 14 years are today supporting many millions of extra "suckers" and still-immature trees, plus many millions of extra dead and dying trees and associated debris. In the pre-project "do nothing, let it burn" baseline, such new and old trees were readily torched. Our hard-fought reduction in severe fires has produced a substantial densification of vegetation across many SFM project areas in northern Australia, in the process sequestering (storing) many millions of tonnes of extra carbon.

For a decade already, many pastoralists running SFM projects have observed - and fielded complaints - that vegetation cover is densifying significantly, and that Pastoral leases are becoming less productive as cattle properties. Yet Canberra's 2023 plan deems sequestration to start only after the SFM EA method's 2024 name change, simply ignoring profound real-world fire-regime changes since the early 2010s. **In the case of the Strathburn Station SFM EA project, the baseline period is 2003-2012, so 2024 will be our 12th year of trying our best to stop severe late-season fires.**

Again, to the extent that SFM EA managers have massively reduced late-season fires for a decade, increased carbon storage (sequestration) is well underway. The Department is in a position to reliably model that matter of fact, the scenario in my chart on p. 1. For now, my **guess** is that up to 50% of all sequestration (extra carbon storage) ultimately produced by transferring SFM EA projects may already have occurred. Unreasonably, transferring SFM projects' true sequestration baselines – that is, the decades before hard-fought fire-regime improvements prompted ongoing sequestration - are to be disregarded in the process of estimating increased carbon storage and awarding ACCUs.

In my opinion, there is no good reason for up to 14 years' worth of hard-won sequestration activity to be ignored. After all, the Department has advised that FullCam can now reliably model the amount of carbon stored in SFM EA project areas for a variety of time periods, including (i) current year (now 2024); (ii) last year (now 2023) and (iii) next year (now 2025), as well as (iv) the average of the past five years (now 2019-2023) and (v) the average of past 10 years (now 2014-2023).

Importantly, the existence of reliable satellite fire maps for each and every year since 2000 – see “Fire History” in <https://firenorth.org.au/nafi3/> - suggests the Department could reliably model the true “baseline average carbon stock” for all SFM EA projects eligible for transfer to the new SFM Sequestration and EA method.

In the case of the Strathburn Station project area, the “available science” should allow reliable modelling of the “average carbon stock” over 2000-2012, the latest period through which big, uncontrolled “hot” fires were left to burn; 2000-2012 thus represents the true baseline, before the SFM EA project, fire-fighting and sequestration processes began in 2013.

4. Key concerns: Faulty initial SFM proposal lacks scientific integrity and brings big risk of massive financial losses; if established, unintended consequence may be SFM project areas ultimately being left to burn black

By unreasonably disregarding the “true baselines” spanning the “**do nothing, let it burn**” periods before our SFM EA fire-regimes were profoundly improved from the early 2010s, my guess – based on the model illustrated in my chart on p. 1 - is that the Department’s “current thinking” will leave the best-run SFM projects ultimately under-credited by up to 50% for extra carbon eventually stored, via profoundly improved fire regimes and the associated densification of our landscapes.

It gets worse: the Department’s invention of scientifically invalid and unreasonably inflated estimates of average baseline carbon stocks would expose Indigenous-owned projects and pastoralist project owners to massive financial losses, if unexpected fire events were to burn project areas black, back to their true baseline carbon stocks.

Unfortunately, Canberra’s proposal to use unreasonably inflated starting carbon storage baselines, and thus massively under-compensate northern Australia’s best fire managers for the long-run densification of their landscapes, while also exposing them to the risk of massive financial losses - is a recipe for those landholders to rationally decide not to bother embracing the proposed new SFM Sequestration and EA method.

Some managers may rationally choose to continue with - and complete - their current 25-year SFM EA projects, but then down tools. Fire management would revert to the previous “**do nothing, let it burn**” regime, with many project areas again often burning black before the Wet season, via lightning strikes that still-too-frequently spark uncontrolled fires.

Conclusion: The Department must embrace the fundamental science around sequestration or Indigenous owners and pastoralists may simply shun the new SFM method. Over time, much of the past decade’s sequestration would go up in smoke, removing the densification Canberra values at zero, and restoring earlier levels of pastoral viability. That may end up being a rational response by many big existing SFM project proponents but it would be a great pity, a bad outcome for Australia’s fight against global warming and major opportunity lost, for all sorts of reasons.

5. A simple fix, via an improved reading of CFI Act rules around “additionality”, “newness” and “permanence”?

The source of the Department’s faulty initial proposal - and so the basis for fixing it - appears simple. The suspicion is that the Department’s scientifically invalid proposal flowed from an avoidable misreading of the law around “additionality” and “newness”. If that is indeed the case, the available fix is as simple as the Department properly recognising that the fact sequestration has been underway on big well-run SFM EA projects for over a decade already is actually **neither here nor there** when considering “additionality” and “newness” issues around the new 2023 SFM sequestration and EA method.

The thinking here is as follows. The Department’s starting point no doubt was the independent Chubb Review confirming that all ACCU methods – including the proposed new SFM Sequestration and EA method - must satisfy the six CFI “Offsets Integrity Standards”. As you can see in the snippet (overleaf) and in the link below, “Additionality” is front and centre: specifically, all methods “should result in carbon abatement that is **unlikely to occur in the ordinary course of events (disregarding the effect of this [CFI] Act)**” (my emphasis): <https://www.legislation.gov.au/C2011A00101/latest/text>

Back in November, DCCEEW official Brett Kerr advised SFM stakeholders that consultation on sequestration baselines and crediting issues remains on-hold, as the Department sought “advice” around “legal matters” and CFI legislation. The whole SFM industry assumes that the “advice” being sought is around questions of “additionality” and “newness”.

As noted above, the industry’s suspicion is that **misguided post-Chubb Review legal concerns** around “additionality” and “newness” are the thing that prompted the Department’s faulty and unscientific *initial* approach, viz “It is not proposed to credit projects for sequestration that occurred while the project was under an SFM emission avoidance method”.

The Department appears to have made the simple (false) assumption that “old” sequestration via SFM EA projects cannot legally be credited under the “new” SFM Sequestration and EA method. But proper thinking about “additionality” and “newness” accepts that SFM industry sequestration currently well underway is indeed “**unlikely to occur** in the ordinary course of events (**disregarding** the effect of this [CFI] Act”. **Crucially, the relevant “ordinary course of events” is the previous “do nothing, let it burn” regime**, not the current careful fire control by SFM EA projects under the CFI Act.

Proposed new SFM Sequestration and EA method obviously must satisfy the six Integrity Offsets Standards

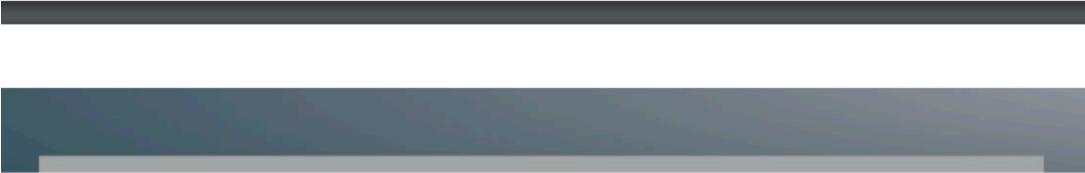
4. What are the offsets integrity standards?

The offsets integrity standards are the legislated criteria that all methods under the ERF must meet. They are based on international standards and ensure carbon credits issued under methods represent real emissions reductions that may be counted towards meeting Australia’s international emissions reduction obligations.

There are six offsets integrity standards, which are contained in section 133 of the Act. A summary of the standards is provided below, with the full standards as specified in legislation provided in section 6.

1. **Additionality:** A method should result in carbon abatement that is unlikely to occur in the ordinary course of events (**disregarding the effect of the Act**).
2. **Measurable and verifiable:** A method involving the removal, reduction or emissions of greenhouse gases should be measurable and capable of being verified.

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3. **Eligible carbon abatement:** A method should provide abatement that is able to be used to meet Australia’s international mitigation obligations.
 4. **Evidence-based:** A method should be supported by clear and convincing evidence.
 5. **Project emissions:** Material greenhouse gas emissions emitted as a direct result of the project should be deducted.
 6. **Conservative:** Where a method involves an estimate, projection or assumption, it should be conservative.

Methods and variations must satisfy all of the standards.

<https://www.cleanenergyregulator.gov.au/DocumentAssets/Documents/Information%20Paper%20on%20the%20Offsets%20Integrity%20Standards.pdf>

Furthermore, on “additionality”, “newness” and “permanence”, the following five SFM facts are highly relevant:

1. SFM EA projects and (the proposed) SFM Sequestration and EA projects are the same thing, via the one-time-only improved fire regime prompted by the CFI Act.
2. “Emissions avoidance abatement is not subject to a permanence obligation as there is no risk of reversal” (p. 24, DCCEEW, draft 2023 SFM Simple Method Guide).)
3. ERAC is “aware that, for sequestration projects to give rise to climate benefits that are equivalent to those associated with emissions avoidance projects, they must be additional for all time [ie. permanent]”. p. 9
<https://www.cleanenergyregulator.gov.au/DocumentAssets/Documents/Information%20Paper%20on%20the%20Offsets%20Integrity%20Standards.pdf>

4. “Sequestered carbon can be released back into the atmosphere by human-induced or natural events, thereby reversing the environmental benefit of the SFM project. Sequestration is regarded as having a ‘permanent’ benefit to the atmosphere if it is maintained for 100 years. Therefore, all ACCU Scheme sequestration projects have permanence obligations …” (p. 24, DCCEEW, draft 2023 SFM Simple Method Guide).
5. SFM EA projects on Pastoral leases must negotiate consent – especially around “permanence obligations” - from Native Title traditional owners (TOs) before there is any scope to transfer to any proposed SFM Sequestration method: <https://www.cleanenergyregulator.gov.au/ERF/Choosing-a-project-type/Opportunities-for-the-land-sector/eligible-interest-holder-consent>

Again, it appears straightforward to conclude that the fact SFM sequestration (increased carbon storage) processes began up to 14 years ago on the best-run SFM EA projects – reflecting the CFI Act driving improved project-area fire regimes – is neither here nor there for determining “additionality” and “newness” around the new SFM method. As is clearly documented above, the CFI legislation explicitly states “disregarding the effect of this [CFI] Act”.

That is, it is perfectly appropriate to carefully count all increased carbon storage that has flowed from the CFI Act’s SFM EA method. That’s why, in the Department’s latest consultation session online, industry participants stated firmly that the use of the phrase “backdating credits” is highly inappropriate. All SFM industry participants agreed that **all** carbon storage ultimately generated by improved SFM over the past decade should be identified, measured and properly acknowledged.

Importantly, however, sequestration is not assured until a “permanence” deal is done and long-term fire control is guaranteed: the CFI’s “additionality” and “newness” requirements for SFM EA projects transferring to the proposed SFM Sequestration and EA method are not satisfied until the “permanence” requirement is met. That is, while potential sequestration began with profound fire-regime changes up to 14 years ago, something big and important is required to “lock in” the extra carbon stored (“sequestered”) via improved fire management. That “big and important” thing is the critical new “permanence obligation” (via TO consent) that is properly at the centre of any SFM Sequestration method.

The situation is perhaps best explained and understood via references to proponents/pastoralists with project areas - including Strathburn Station – covered by Native Title. Critically, a new “permanence obligation” and Native Title Holder consent must be negotiated with traditional owners (TOs) and formalised before any existing EA project can transfer to any proposed SFM Sequestration method.

The issues of “additionality” and “newness” were **specifically mentioned in the Chubb Review**, in Recommendation 6: “At the project-level the regulatory additionality requirement and the government program requirement are appropriate, but the newness requirement should be refocussed to place emphasis on ‘new’ abatement that will be credited following a project’s commencement date. At the method-level, additionality tests should be applied **on the basis of evidence and observable common practice**, and not require statements of intent or financial viability by project proponents”: p. viii and 17 in <https://www.dcceew.gov.au/sites/default/files/documents/independent-review-accu-final-report.pdf>

Importantly, as noted above, the relevant “ordinary course of events” is the previous “do nothing, let it burn” regime, not the current careful fire control by SFM EA projects under the CFI Act. The fact that SFM EA projects retain the simple, easy option – even before completing 25 years – of downing tools and leaving severe fires (sparked by lightning) to burn uncontrolled – as we saw with the “do nothing, let it burn” pre-CFI common practice, during the SFM EA project’s true baseline period – illustrates the crucial importance of “permanence obligations” for SFM sequestration.

The point is that current SFM “sequestration” associated with EA projects on Pastoral leases is “ephemeral” until all “eligible interest holders” do a deal on “permanence” under any new SFM Sequestration method. In my 2022 and 2023 discussions, I found that this is a very serious matter. TOs must agree to the densification of their traditional country, while pastoralists must commit to keep stopping fires, making (recent) densification ongoing/permanent. It is this difficult yet-to-be-secured mutual agreement to continue effective fire control “forever” (even after EA crediting has ceased) to ensure “permanence” that will make or break ongoing real-world sequestration. Without “permanence”, expired EA project areas may be left to burn black regularly in the future, with (recently stored) carbon going up in smoke (in the process, restoring the Pastoral lease’s pre-SFM viability as a cattle property). As noted, all that would be a great pity, for a range of reasons.

7. Summary: Critical assessment of, and prospects for, DCCEEW’s proposed SFM Sequestration and EA method

All stakeholders have an interest in the new SFM method embracing fundamental scientific realities, allowing the proper recognition, estimation and crediting of all carbon sequestered across northern Australia since the early 2010s, by well-run transferring SFM EA projects. The Department says it has the tools to reliably model sequestration. I’m arguing that it should do so, starting by modelling each transferring SFM EA project’s true “baseline average carbon stock”.

Critically, SFM EA projects and SFM Sequestration and EA projects are the same thing, via their one-time-only improved fire regime prompted by the CFI Act. Accordingly, the “true baseline period” for transferring SFM EA projects (say 2003-2012) also represents the true baseline period for the corresponding (replacement) SFM Sequestration and EA project, with that period also representing the scientifically valid period over which to model the “baseline average carbon stock”.

I've used my chart of a stylised model of a 25-year SFM EA project on p. 1 to argue that the Department's faulty initial approach – "It is not proposed to credit projects for sequestration that occurred while the project was under an SFM emission avoidance method" – is misguided and would result in many well-run Indigenous and pastoral SFM projects being under-credited by up to (say) 50% for the total sequestration (extra carbon pools/vegetation densification) ultimately produced via the projects' profoundly improved fire regimes (already in place for up to 14 years).

The Department's faulty proposal would see **SFM Sequestration ACCUs each representing perhaps 1.5-2 tons of carbon stored**, not the standard one ton of carbon dioxide equivalent avoided or stored. Further, the Department's plan to invent **scientifically invalid starting-point carbon storage baselines** – set near 2023 levels that are massively inflated relative to SFM EA projects' true carbon baselines – suggests the serious **risk of massive financial losses for SFM proponents**, if severe fire events unexpectedly engulf project areas and torch carbon stocks accumulated for as long as the past 14 years.

Obviously, such an approach is unacceptable to those who have been operating well-run projects for up to 14 years. It would lead to perverse incentives including: (i) SFM project proponents not bothering to embrace the new SFM method; and (ii) pastoralists with well-run SFM projects perhaps "downing tools" from the late 2030s, after completing their 25-year SFM EA projects, allowing severe late-season fires (sparked by lightning) to burn uncontrolled again – as was the standard "**do nothing, let it burn" common practice of earlier decades**", during SFM EA projects' true baseline periods.

Fixing the Department's fundamentally flawed approach may simply involve an improved understanding of CFI matters of "additionality", "newness" and "permanence". The industry assumes the Department's scientifically invalid initial proposal flowed from a basic misreading of those critical legal matters. Accordingly, the available fix probably is as simple as the Department recognising that the fact sequestration has been underway on big well-run SFM EA projects across northern Australia for up to 14 years already is actually a non-issue for "additionality" considerations around the proposed new SFM Sequestration and EA method; again, **on "additionality", the CFI Act explicitly states "disregarding the effect of this Act"**. Again, the relevant "**ordinary course of events**" for transferring SFM projects is the previous "**do nothing, let it burn" regime**", not the current careful fire control by SFM EA projects prompted by the CFI Act (see Section 6).

"Permanence" deals and Indigenous consents are two big new things that matter. ERAC's "additionality" and "newness" requirements for the proposed SFM Sequestration and EA method should be properly satisfied by proponents securing currently non-existent and hard-to-get commitments from all eligible interest-holders – especially traditional owners - to maintain ongoing fire management, and thus to maintain equilibrium carbon stocks, for the required 25 or 100 years. (This is true not only for SFM projects on Pastoral leases, but so too those on other Indigenous land.)

To conclude, I'm hoping the Department is in the process of fixing its initial proposal by accepting the "additionality" observations in Section 6. Embracing the straightforward legal assessment above would allow it to properly restore scientific integrity to its proposed new SFM Sequestration and EA method. In that case, the Department would be on a six-month runway – see below - towards generating increased prosperity for the scores of Indigenous communities and pastoralists currently operating well-run SFM EA projects across northern Australia.

8. Canberra's new, revised six-month timeline for establishment of proposed SFM Sequestration and EA method

The revised, now roughly six-month timeline below was unveiled by a DCCEEW official on 22 February at the 2024 North Australia Savanna Fire Forum in Darwin. It remains to be seen if the revised timeline is "doable". The only good start would involve the Department in coming weeks announcing that it has received legal advice accepting the industry's critique above, and that it has embraced scientifically valid baselines for modelling and crediting sequestration by SFM EA projects transferring to the proposed 2023 SFM Sequestration and EA method.

Key milestone/deliverable	Indicative timing
Development of method exposure draft	January 2024 – April 2024
Release SavCAM beta tool & method exposure draft for public consultation (subject to ERAC approval to release)	May 2024
SavCAM tool finalised	June 2024
Draft method determination finalised by Department	June 2024
ERAC assessment of draft method against Offsets Integrity Standards	June 2024
Ministerial consideration to make the method (subject to ERAC approval)	July – August 2024

Finally, if you consider my critique of the Department's current proposal to be somewhat incorrect or otherwise unhelpful, please do not hesitate to get in touch or severely criticise my analysis to those who matter. Any feedback is welcome via strathburnastation@gmail.com

Best wishes,
Rory

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Separately, I have written to the Minister for Health and Aged Care, Mark Butler, his Departmental Secretary, Brendan Murphy, and other Members and Senators of our Australian Parliament, requesting a Parliamentary inquiry into what I described as "**the biggest medical scandal in Australia's history**". Through the dozen or so years I've developed the Strathburn Station SFM project, separately I've taken the time to investigate and document unambiguous evidence of an Epic Diabetes Fraud by a cabal of four highly influential University of Sydney professors of science - **Jennie Brand-Miller, Stephen Colagiuri, Stephen Simpson and Stewart Truswell – and diabetes drug-seller Novo Nordisk**. This University of Sydney menace to public health continues to fuel type 2 diabetes (T2D), cardiovascular disease (CVD), years and decades of unnecessary family stresses and misery, and then early death for millions of hapless Australians, especially Indigenous Australians. Today's readily reversible T2D epidemic – **driven by ongoing excess consumption of sugar and grain-based products** - is driving Australia's growing crisis in General Practice and Medicare:

<https://www.australianparadox.com/pdf/Letter-Health-Minister-n-Secretary-Feb23.pdf>

Here is my formal **Submission to Canberra's 2023 Inquiry into Diabetes: (features 8-page timeline documenting an epic diabetes fraud by distinguished University of Sydney sci-careerists and Novo Nordisk)**: <https://www.australianparadox.com/pdf/Submission-HoR-DIABETES-INQUIRY.pdf>

Here's me, Emma Alberici and ABC TV's *Lateline* on the University of Sydney's Australian Paradox: <https://www.youtube.com/watch?v=OwU3nOFo44s>

Here's an obesity-reversing/T2D-reversing diet advised by Dr Peter Brukner, recently the Australian cricket team's doctor, and the eminent 1923 medical text from where it came: <https://www.australianparadox.com/pdf/PeterBrukner.pdf> ; <https://www.australianparadox.com/pdf/1923-Medicine-Textbook.pdf>

A life in our times: Vale Alexander "Sandy" Robertson (1933-2015): <http://www.australianparadox.com/pdf/AlecRobertson-born2oct33.pdf>

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Strathburn Cattle Station is a proud partner of YALARI, Australia's leading provider of quality boarding-school educations for Aboriginal and Torres Strait Islander teenagers. Check it out at <http://www.strathburn.com/yalari.php>